UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re: : CHAPTER 13 : JUDGE: JJT

Patricia Bermudez

Debtor

Patricia Bermudez

Movant

v : **Bankruptcy No.5:16-04514 (JJT)**

Charles DeHart
Chapter 13 Trustee

Respondent

MOTION SEEKING APPROVAL OF THE WRONGFUL TERMINATION SETTLEMENT AGREEMENT

Movant, by its attorney, Stuart D. Gavzy, Esquire, hereby requests approval for Wrongful Termination Settlement Agreement.

- 1. Movant is The debtor, Patricia Bermudez.
- 2. I am counsel for the Debtor, Movant, herein, **Patricia Bermudez**, on whose behalf I filed a Petition under Chapter 13 of the Bankruptcy Code commencing this case on November 2, 2016.
- 3. The Debtor's Amended Chapter 13 Plan was confirmed by Order of this Court on April 27, 2017 and provides for a pot plan totaling \$621,720.00. Debtor continues to make her regular monthly Plan payments.

4. One of the assets in this case was claim against a former employer and

prosecuting this case, under Order of Retention to be entered by this Court, is

Jeremy Cerruti, Esq., of the law firm of Karpf, Karpf & Cerruti.

5. This lawsuit has been settled for the sum of \$85,000.00, to be allocated between

the Debtor and special counsel, Jeremy Cerruti, Esquire as follows: \$50,346.65 to

the Debtor and \$34,653.35 to counsel.

6. The factual statements set forth in this Motion have been made based on a

personal review by me and staff to the list of insiders and creditors of the Debtor.

This effort did not reveal any conflicts.

WHEREFORE, Movant respectfully requests that this court enter an

Order:

a. Granting the Settlement of the Debtors Wrongful Termination Lawsuit.

b. Any non-exempt proceeds be turned over to the Trustee for disbursement to the

Unsecured Creditors

c. Granting any other relief that this Court deems equitable and just.

Dated: July 21, 2017,

/s/Stuart D. Gavzy, Esquire

Attorney for Patricia Bermudez, Debtor

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